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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

LAS VEGAS SUN, INC., a Nevada
 corporation,

Plaintiff,

v.

SHELDON ADELSON, an individual, and as
 the alter ego of News+Media Capital Group
 LLC, Las Vegas Review-Journal, Inc., and
 Interface Operations LLC dba Adfam;
 PATRICK DUMONT, an individual, and as
 alter ego of Las Vegas Review-Journal, Inc.,
 News+Media Capital Group, LLC, and Interface
 Operations LLC dba Adfam; NEWS+MEDIA
 CAPITAL GROUP LLC, a Delaware limited
 liability company; LAS VEGAS REVIEW-
 JOURNAL, INC., a Delaware corporation;
 INTERFACE OPERATIONS LLC DBA
 ADFAM, a Delaware limited liability company

Case No. 2:19-cv-01667-ART-VCF

**STIPULATION AND ORDER
 REGARDING SEALING (1) PLAINTIFF'S
 PROPOSED REPLY IN SUPPORT OF
 PLAINTIFF'S OBJECTION TO ORDER
 OVERRULING PLAINTIFF'S
 OBJECTION TO THE SPECIAL
 MASTER'S ORDER (ECF NO. 591) [ECF
 NO. 619]; AND (2) DEFENDANTS'
 PROPOSED REPLY IN SUPPORT OF
 DEFENDANTS' OBJECTION TO
 MAGISTRATE JUDGE'S ORDER RE:
 PLAINTIFF AND
 COUNTERDEFENDANTS' MOTION FOR
 A PROTECTIVE ORDER (ECF NO. 619)
 [ECF NO. 627]**

and as alter ego of Las Vegas Review-Journal, Inc., and News+Media Capital Group, LLC; and DOES, I-X, inclusive,

Defendants.

LAS VEGAS REVIEW-JOURNAL, INC., a Delaware corporation,

Counterclaimant,

v.

LAS VEGAS SUN, INC. a Nevada corporation; BRIAN GREENSPUN, an individual and as the alter ego of Las Vegas Sun, Inc.; GREENSPUN MEDIA GROUP, LLC, a Nevada limited liability company, as the alter ego of Las Vegas Sun, Inc.,

Counterclaim Defendants.

LAS VEGAS SUN, INC., and Counterdefendants BRIAN GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm, and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, PATRICK DUMONT, and INTERFACE OPERATIONS LLC DBA ADFAM (collectively the “Review-Journal”), by and through their counsel of record, Kemp Jones, LLP, Jenner & Block LLP, and Richard L. Stone, Esq., hereby stipulate and agree as follows:

1. On March 18, 2022, the Court ordered, *inter alia*, the parties to meet and confer prior to filing any additional motions to seal. ECF No. 619. The parties’ met-and-conferred on April 22, 2022, regarding sealing relating to Plaintiff’s proposed Reply in support of Plaintiff’s Objection to Order Overruling Plaintiff’s Objection to the Special Master’s Order (ECF No. 591 [ECF No. 619], and Defendants’ proposed Reply in support of Defendants’ Objection to Magistrate Judge’s Order Re: Plaintiff & Counterdefendants’ Motion for a Protective Order (ECF No. 619) [ECF No. 627]. For the Sun, Marla Hudgens, Esq. appeared, and for the Review-Journal, Mona Kaveh, Esq. appeared.

1 2. The parties agree that the following is appropriate for sealing:

2 (a) References to the non-public portions of the 2019 final arbitration award. The same or
3 similar same references were ordered sealed by the Special Master under the good cause
4 standard. *See, e.g.*, Court Orders at ECF No. 303 at 45:19–47:2, 52:22–54:16; ECF No. 368
5 at 17:4-8; and ECF No. 421 at 2:18-20 (finding good cause to seal various 2019 arbitration
6 materials attached to discovery briefs); *see also* 01/10/22 Hearing Transc. at 63:12–65:2
7 (Special Master granting Defendants’ sealing motion at ECF No. 508 relating to the sealing
8 of the non-public portions of the 2019 final arbitration award and holding, “So my view is
9 that the motion to seal by defendants, the non-public portions of the arbitration award,
10 should simply be granted consistent with what I said last week.”); and

11 (b) Portions of the deposition transcript of the Sun’s 30(b)(6) designee. The portion sealed
12 and referenced in Defendants’ brief relates to specific figures that the Sun has marked as
13 Attorneys’ Eyes Only.

1 DATED this 22nd day of April, 2022.

DATED this 22nd day of April, 2022.

2 LEWIS ROCA ROTHGERBER CHRISTIE LLP

KEMP JONES LLP

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4 By: /s/ Marla J. Hudgens

By: /s/ Mona Kaveh

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Attorneys for Plaintiff/Counterdefendants

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22 **IT IS SO ORDERED:**

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25 UNITED STATES MAGISTRATE JUDGE

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27 DATED: 4-26-2022